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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,

Case No. 3:23-cv-03417-VC-TSH

Individual and Representative Plaintiffs,

**DECLARATION OF MICHELLE WOODHOUSE
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO CONSIDER
WHETHER ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED [DKT. 473]**

v.

META PLATFORMS, INC., a Delaware
corporation,

Defendant.

1 I, Michelle Woodhouse, hereby declare:

2 1. I am an Associate General Counsel for Defendant, Meta Platforms, Inc. (“Meta”).
 3 I provide this Declaration based on my personal knowledge and/or after a reasonable investigation
 4 of the relevant facts. If called to testify as a witness, I could and would testify competently thereto.

5 2. Pursuant to Civil L.R. 79-5(f)(3) and the Court’s March 12, 2025 Order (Dkt. 477),
 6 I make this Declaration in support of Plaintiffs’ Administrative Motion to Consider Whether
 7 Another Party’s Material Should Be Sealed, (Dkt. 473 (“Sealing Motion”)), in consideration of and
 8 in accordance with the Court’s guidance. Meta seeks leave to file under seal certain portions of
 9 Plaintiffs’ March 10, 2025 Motion for Partial Summary Judgement (“Summary Judgment
 10 Motion”).

11 3. Meta requests the Court’s permission to file under seal narrowly tailored portions of
 12 the Summary Judgment Motion, as set forth in the redacted version filed by Plaintiffs pursuant to
 13 the Court’s March 12, 2025 Order (Dkt. 477). Specifically, Meta respectfully requests the Court’s
 14 permission to make redactions to three categories of information. **First**, Meta respectfully seeks to
 15 redact information necessary to prevent the disclosure of Meta’s financial information, including
 16 Meta’s internal financial considerations and decisions regarding business development such as
 17 budgets, product costs, and estimated revenues. Maintaining the confidentiality of Meta’s non-
 18 public financial information is critical to Meta’s business. Disclosure of such information, such as
 19 non-public forecasts of revenues and costs associated with specific projects or ventures, risks
 20 competitive harm to Meta, including by providing competitors and potential counterparties insight
 21 into Meta’s financial analyses and business strategies. **Second**, Meta respectfully seeks to redact
 22 information necessary to prevent the disclosure of the monetary terms of an agreement with a third-
 23 party, which is limited to the single dollar amount of the agreement. Disclosure of such information
 24 would put the third party’s confidential information at risk and pose a competitive disadvantage to
 25 Meta and the third party who obtained promises of confidentiality from Meta for this information
 26 and is not party to this lawsuit. **Third**, Meta also respectfully seeks to redact information necessary
 27 to prevent the disclosure of the identity of third-parties (who are not parties to this lawsuit), where
 28 Meta has entered into and are subject to confidentiality and non-disclosure obligations and

1 agreements, where these third-parties obtained promises of confidentiality from Meta. Disclosure
2 of such information would put the third party's confidential information at risk. To the extent the
3 Court believes the identity of these third-parties should be made public, Meta requests that the
4 Court allow these third parties an opportunity to put in their own declaration justifying
5 confidentiality. Meta has previously requested to seal documents based on similar third-party
6 information, (e.g., Dkt. 391-1, ¶ 6; Dkt. 409-1, ¶ 12), which this Court has granted, (e.g., Dkt. 393
7 (granting Dkt. 391); Dkt. 414 (granting Dkt. 409).)

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed in San Jose, California on this 19th day of March 2025.

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6 Michelle Woodhouse

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